

BILL OF COMPLAINT FOR PARTITION OF REAL ESTATE

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of William C. Woerner, and Eva Martha Woerner, his wife; Kenneth M. Woerner, and Ethel M. Woerner, his wife; and Lorraine C. Zimmerman, widow, by Edwin F. Nikirk, their solicitor, respectfully represents unto your Honorable Court:

FIRST: That your Complainants and the Respondents in these proceedings are adults, sui juris, and that the following parties to this proceeding are residents of the State of Maryland: Margaret Woerner Carmack, and Emory L. Carmack, her husband, 222 East Church Street, Frederick, Maryland; Eloise Woerner Haines, widow, 101 West 14th Street, Frederick, Maryland; Mary Alice Woerner Harley, and B. Theodore Harley, her husband, 904 Pin Oak Road, Hagerstown, Maryland; Mildred V. Kirby, and Robert D. Kirby, her husband, 111 Locust Street, Frederick, Maryland; Calvin C. Wilhide, and Virginia M. Wilhide, his wife, 6206 Fairdel Avenue, Baltimore, 6, Maryland, Pauline R. Phelps, widow, Route 6, Frederick, Maryland; and John M. Shuff, and Curtis W. Shuff, Executors of the Last Will and Testament of Leonard A. Shuff, deceased, Frederick County, Maryland.

SECOND: That the following parties to this proceeding are non-residents of the State of Maryland, residing at the addresses indicated: Kenneth Wilhide, and Nellie Wilhide, his wife, Route 1, Shippensburg, Pennsylvania; Kathleen Mickey, and Richard Mickey, her husband, Box 113, Marion, Pennsylvania; Iona Shaffer, and Welty Shaffer, her husband, 1911 Lincoln Way East, Chambersburg, Pennsylvania; and Betty Herr, and Kenneth Herr, her husband, 547 Cumberland Avenue, Chambersburg, Pennsylvania.

THIRD: That all of the parties to this proceeding, with the exception of John M. Shuff, and Curtis W. Shuff, Executors of the Last Will and Testament of Leonard A. Shuff, deceased, are first cousins, and the closest living heirs at law and next of kin of Mary Lorraine Shuff, deceased, who departed from this life intestate on July 23, 1963, seized and possessed of all that piece or parcel of land, situate, lying, and being on the south side of East Second Street, in Frederick City, Frederick County, State of Maryland, known as 22 East Second Street, in said City, County,